

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JPMORGAN CHASE BANK, N.A.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 14-cv-4278
)	
LINDSAY JENKINS; 30 EAST HURON)	Judge Robert W. Gettleman
CONDOMINIUM ASSOCIATION;)	Magistrate Judge Michael T. Mason
UNKNOWN OWNERS AND)	
NONRECORD CLAIMANTS; and)	
UNKNOWN OCCUPANTS,)	
)	
Defendants.)	

MOTION FOR THE ENTRY OF A JUDGMENT OF FORECLOSURE AND SALE

Now comes the Plaintiff, JPMORGAN CHASE BANK, N.A., by and through its attorney, Shapiro Kreisman & Associates, LLC, and pursuant to 735 ILCS 5/15 - 1506, moves this court for the entry of a Judgment of Foreclosure and Sale, and in support thereof, Plaintiff states as follows:

1. Plaintiff's Motion for Summary Judgment is pending against Defendant Lindsay Jenkins.
2. Plaintiff's Motion for Default is pending against the remaining defendants, 30 East Huron Condominium Association, Unknown Owners and Non-Record Claimants, and Unknown Occupants, all of whom have failed to Answer or otherwise plead to Plaintiff's Complaint.

WHEREFORE, Plaintiff respectfully requests that this honorable court enter a Judgment of Foreclosure and Sale in favor of Plaintiff and against all defendants and for such other and further relief as this court deems just.

/s/ Joseph Mungovan Herbas
ARDC #6277645
Shapiro Kreisman and Associates, LLC

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Bannockburn, IL 60015
Tel (312) 994-4740
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jherbas@logs.com

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2016, I electronically filed this motion with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following:

Lindsay Jenkins
300 Burns Street
Forest Hills, NY 11375
Email: lindsayhjenkins@aol.com

Andrew Douglas LeMar
Burke Warren MacKay & Serritella, P.C.
330 N. Wabash Ave.
22nd Floor
Chicago, IL 60611
Email: alemar@burkelaw.com

and I hereby certify that on April 4, 2016, I mailed by United States Postal Service, the document(s) to the following non-registered participants together with the Motion to Appoint a Special Commissioner and proposed Judgment of Foreclosure and Sale:

30 East Huron Condominium Association
Attn: David M. Bendoff
750 W. Lake Cook Road
Buffalo Grove, IL 60089

Unknown Owners and Non-Record Claimants
30 East Huron Street, Unit 4406
Chicago, IL 60611

Unknown Occupants
30 East Huron Street, Unit 4406
Chicago, IL 60611

/s/ Joseph Mungovan Herbas
ARDC #6277645
Shapiro Kreisman and Associates, LLC
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